

Chronic Disease Management Programme

Privacy Statement for CDM

Purpose

The Health Service Executive (HSE) must comply with all applicable data protection, privacy and security laws and regulations in the locations in which we operate. We respect your rights to privacy and to the protection of your personal information. The purpose of this privacy statement is to explain how we collect and use personal information as part of the Chronic Disease Management Programme.

The primary data protection legislation that applies to us is the EU General Data Protection Regulation (GDPR), supplemented by Irish legislation (primarily the Data Protection Acts 1988 – 2018 and ePrivacy Regulations 2011). The HSE seeks to be transparent with the public about our collection and use of personal information in line with our obligations under GDPR.

If you wish to find out more regarding the HSE data protection legislation, please visit: www.hse.ie/GDPR

What information is shared as part of the Chronic Disease Management programme?

When you confirm your participation on the CDM Programme with your GP, the GP is contracted to send the following information to the HSE following each structured review:

- Identification and demographic data
- Clinical details – chronic disease diagnoses
- Risk factor data
- Symptoms / Investigations data

Why does the HSE need this information and what do they intend on using the information for?

As part of the Chronic Disease Management Programme, contracted GP's have a statutory and legislative basis for collecting patient's data for the programme. GP's will submit data returns to the HSE in respect of each of their patients participating in the programme. Data will be returned to HSE after each scheduled review by the GP for the purpose of:

- Supporting the provision of quality patient care through the CDM programme
- Supporting CDM quality assurance and quality improvement initiatives
- Supporting CDM planning and evaluation processes via epidemiologic and public health processes as appropriate
- Enabling probity assurance processes as required; and
- Facilitate payments to the GP for CDM services provided

Who will have access to the information collected by the HSE as part of the Chronic Disease Management Programme and why?

Patient information which is collected by the HSE is treated with utmost confidentiality. Only fully anonymised clinical data will be accessed by authorised users for CDM management, reporting and analytics purposes

How long will the HSE hold onto information collected as part of the Chronic Disease Management Programme?

The HSE will only keep patient information for as long as it is legally required to do so. The legal retention periods for medical information are recorded in the HSE's Record Retention Policy and a copy of this is published on the HSE website at www.hse.ie/eng/services/list/3/acutehospitals/hospitals/ulh/staff/resources/pppgs/rm/retret2013.pdf.

Will the HSE use information collected as part of the Chronic Disease Management Programme for any other purpose other than those listed?

No. If the HSE wishes to use the patient information collected as part of the Chronic Disease Management Programme, it will seek the consent of the patients or anonymise the patient information first.

Can I request a copy of my information which is collected by the HSE as part of the Chronic Disease Management Programme?

Yes, under GDPR guidelines, you can request a copy of your information collected by the HSE as part of the CDM Programme. Further information on this subject can be found on the HSE website at www.hse.ie/GDPR

Can I withdraw my participation from the Chronic Disease Management Programme?

Yes, you can withdraw your participation in the Chronic Disease Management Programme at any time by advising your GP.

Your Rights under the General Data Protection Regulation

Under GDPR guidelines you can:

- Request access to your personal information
- Request correction of the personal data we hold about you
- Request the erasure of your personal data (known as the right to be forgotten)
- Object to the processing of your personal data
- Request restriction of processing your personal data
- Request the transfer of your personal data
- Withdraw consent for us to retain your data

Contact Information for HSE Data Protection Officer

If you wish to avail of any of the above options please contact our Data Protection Officer at dpo@hse.ie or call 01 6352478.